

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

JAMES PETER CONLAN

Plaintiff,

v.

MIDDLE STATES ASSOCIATION OF  
COLLEGES AND SCHOOLS and THE  
MID-ATLANTIC REGION COMMISSION  
ON HIGHER EDUCATION doing business  
as MIDDLE STATES COMMISSION ON  
HIGHER EDUCATION,

Defendants.

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CIVIL NO. 15-2841 (CCC)

**SECOND MOTION FOR ENLARGEMENT OF TIME TO ANSWER, MOVE, OR  
OTHERWISE PLEAD**

TO THE HONORABLE COURT:

NOW COME Defendants Mid-Atlantic Region Commission on Higher Education (“MARCHE”), *doing business as* the Middle States Commission on Higher Education (MSCHE), and Middle States Association of Colleges and Schools (“MSACS”), through their undersigned attorneys, and respectfully set forth and pray:

1. The original 36-page Complaint in this case was filed on November 16, 2015. Copies of the Complaint and of the Summons directed at MARCHE, MSCHE, and MSACS were served on **March 10, 2016**. Therefore, the answer to the complaint or a motion to dismiss was due on March 31, 2016.

2. Defendants retained the undersigned attorney and law firm to represent it in this case. While they were working assiduously to gather the information required to prepare an answer to the

Complaint or a motion to dismiss, it was not possible to conclude its work at that time, and requested that this Court enlarge the term by thirty (30) days, and that the time to file any such document lapse on April 30, 2016.

3. While that motion was pending, Plaintiff filed an Amended Complaint on April 19, 2016 that spans 161 pages, adds over twenty defendants, and purports to state claims for the issuance of, among other remedies, a “writ of assize of novel disseisin,” a “writ of assize of nuisance,” a “writ of entry,” equitable relief under the Racketeer Influenced Corrupt Organizations, and civil rights violations. The analysis of Plaintiff’s Amended Complaint is ongoing, but it has become clear that the motion to dismiss the original Complaint that was under consideration and review by the appearing defendants is drastically different from the one that will be required by the Amended Complaint. No evidence of service of process upon the additional defendants is on file.

4. Therefore, MARCHE, MSCHE, and MSACS respectfully request that they be granted an additional enlargement of time of thirty (30) days to answer, move, or otherwise plead to the Amended Complaint, to lapse on May 31, 2016. In the alternative, MARCHE, MSCHE, and MSACS respectfully request that the Court consider, if it deems it appropriate for the purpose of conserving judicial resources, granting all of the defendants one single deadline of thirty days after the last defendant has been served, to file their responsive pleadings, motions to dismiss, or otherwise plead.

WHEREFORE, it is respectfully requested from this Honorable Court that it enlarge the time to answer the complaint, move to dismiss, or otherwise plead to defendants until May 31, 2016 or, in the alternative, if the Court deems it appropriate for the purpose of conserving judicial resources, that it grant all of the defendants one single deadline of thirty days after the last defendant has been served, to file their responsive pleadings, motions to dismiss, or otherwise plead.

I CERTIFY: That on this same date this document was filed with the Court's CM/ECF System, which will send a copy to James Peter Conlan, San Mateo Plaza, Apt. PH-3, 1626 San Mateo St., San Juan, PR 00912.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of May, 2016.

S/ Carlos A. Rodríguez Vidal  
U.S.D.C. #201213  
CARLOS A. RODRIGUEZ VIDAL  
GOLDMAN ANTONETTI & CORDOVA, LLC  
P.O. Box 70364  
San Juan, P.R. 00936-0364  
Tel. 759-4117/Fax. 767-9177  
[Crodriguez-vidal@gaclaw.com](mailto:Crodriguez-vidal@gaclaw.com)